

UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF OKLAHOMA

IN RE:

THOMAS, MICHELLE D.

Debtor.

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Case No. 07-10189-R  
(Chapter 7)

**MOTION FOR AUTHORITY TO SELL PROPERTY OF THE ESTATE FREE  
AND CLEAR OF ALL LIENS, CLAIMS, ENCUMBRANCES AND INTERESTS**

[Mineral Interest]

Steven W. Soulé, Trustee (the "Trustee"), hereby requests an Order authorizing him to sell certain property of the estate, free and clear of all liens, claims, encumbrances and interests, if any, with said liens, claims, encumbrances and interests, to the extent valid, to attach to the proceeds in accordance with 11 U.S.C. § 363 and Fed.R.Bank.P. 6004. In support of this Motion, the Trustee states as follows:

1. The above-referenced bankruptcy case was filed by the Debtor, Michelle D. Thomas ("Debtor") as a voluntary proceeding under Chapter 7 of the Bankruptcy Code on February 8, 2007, and the Trustee was subsequently appointed to administer this bankruptcy estate.

2. The property to be sold is described as all of the estate's interest, if any interest exists, in certain property more completely described as following:


All mineral interest belonging to this estate, through the interest of this Debtor, reflected on Exhibit "A" attached hereto and made a part hereof, which are located in Roger Mills County, State of Oklahoma, and Beckham County, State of Oklahoma ("the "Property").

3. The Trustee states that pursuant to 11 U.S.C. §363(b) and (f), he should be authorized by appropriate Order of this Court to sell the bankruptcy estate's interest in the Property, free and clear of any liens, claims, encumbrances and interests, with the liens, claims, encumbrances and interests, to the extent valid, to attach to the proceeds. The Trustee is unaware of any secured liens on the Property.

4. Notice pursuant to Fed. R. Bankr. P. 6004 is hereby given that when the Trustee is granted authority to sell the Property, the Property will be sold by private sale to George G. Vaught, Jr. and Paul L. McCulliss, whose address is P.O. Box 13557, Denver, Colorado 80201-3557. The total purchase price is \$7,250.00.

**WHEREFORE**, the Trustee respectfully requests an Order of this Court authorizing him to sell the Property, free and clear of all liens, claims, encumbrances and interests, with such liens, claims, encumbrances and interests, if any, to attach to the proceeds of the sale approving the sale procedure and the sale without further notice; and, authorizing the Trustee to execute all documents necessary to complete the sale.

**HALL, ESTILL, HARDWICK, GABLE  
GOLDEN & NELSON, P.C.**



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Steven W. Soule, OBA #13781  
320 South Boston Avenue, Suite 400  
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(918) 594-0466  
(918) 594-0505 – fax

**ATTORNEYS FOR TRUSTEE**

(BANKRUPTCY)

#1

NOTICE OF SALE OF REAL PROPERTY

Notice is hereby given that pursuant to an order of the District Court-2nd Judicial District, Roger Mills County, Oklahoma, made and entered on the 11<sup>th</sup> day of July, 1989, in the matter of the Estate of Charles Kent Farni, deceased, Case No. P-89-11, the undersigned personal representative of said estate will sell at public auction to the highest bidder for cash, subject to confirmation of said District Court, on the 25<sup>th</sup> day of July, 1989, at 2:00 o'clock P.m., at the West front door of the Roger Mills County Courthouse at Cheyenne, Oklahoma, all of the right, title, interest and estate of said Charles Kent Farni, deceased, at the time of his death, and all right, title and interest his said estate has, by operation of law, or otherwise, acquired in and to the following described real property, to-wit:

LEASED (3 yrs)  
MARCH-2005  
+  
PRODUCING  
(REV. INT.  
.0439453)

An undivided three-sixty-fourths (3/64) interest in and to the oil, gas and other minerals in and under and that may be produced from the East Half (E1/2) of Section Thirty-six (36), Township Fourteen (14) North, Range Twenty-three (23) West of the Indian Meridian, in Roger Mills County, Oklahoma, containing 320 acres, more or less, according to the U.S. Government Survey thereof (being an undivided 15 net acres of non-producing minerals)

LEASED  
MARCH-2005  
(3 yrs)

An undivided one-thirty-second (1/32) interest in and to the oil, gas and other minerals in and under and that may be produced from the Northeast Quarter (NE1/4) of Section Thirty-five (35), Township Fourteen (14) North, Range Twenty-three (23) West I.M., in Roger Mills County, Oklahoma, containing 160 acres, more or less, according to the U.S. Government Survey thereof (being an undivided 5 net acres of non-producing minerals)

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An undivided one-sixteenth (1/16) interest in and to Lots One (1) through Ten (10) and Seventeen (17) through Twenty-four (24) in Block Fifty (50) of the Original Town of Strong City, Roger Mills County, Oklahoma, according to the recorded plat thereof (including an undivided 0.1414 net acre of producing minerals in Section 24, Township 14 North, Range 23 West I.M.)

Attached  
No. 1

EXHIBIT

A

#2

LEASED  
July-2006  
(3 yrs)

An undivided 12.1-acre interest in and to the oil, gas and other minerals in and under and that may be produced from Lots One (1), Two (2), Three (3) and Four (4), the Southeast Quarter of the Southwest Quarter (SE1/4SW1/4), the Southwest Quarter of the Southeast Quarter (SW1/4SE1/4) and the West Half of the East Half of the Northwest Quarter (W1/2E1/2NW1/4) of Section Thirty-one (31), Township Fourteen (14) North, Range Twenty-two (22) West I.M., in Roger Mills County, Oklahoma, containing 273.6 acres, more or less, according to the U.S. Government Survey thereof (being an undivided 12.1 net acres of non-producing minerals)

LEASED  
July-2006  
(3 yrs)

An undivided three-thirty-seconds (3/32) interest in and to the oil, gas and other minerals in and under and that may be produced from the North Half of the Southeast Quarter (N1/2SE1/4), the Southeast Quarter of the Southeast Quarter (SE1/4SE1/4) and the Northeast Quarter of the Southwest Quarter (NE1/4SW1/4) of Section Thirty-one (31), Township Fourteen (14) North, Range Twenty-two (22) West I.M., in Roger Mills County, Oklahoma, containing 160 acres, more or less, according to the U.S. Government Survey thereof (being an undivided 15 net acres of non-producing minerals)

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by mother  
JUST BEFORE  
SHE DIED

~~An undivided one-thirty-sixth (1/36) interest in and to the oil, gas and other minerals in and under and that may be produced from the South Half of the South Half (S1/2S1/2) of Section Nine (9), Township Eleven (11) North, Range Twenty-three (23) West I.M., in Roger Mills County, Oklahoma, containing 160 acres, more or less, according to the U.S. Government Survey thereof (being an undivided 4.44 net acres of producing minerals)~~

LEASED  
Oct. 06  
(3 yrs)

An undivided seven-two thousand forty-eighths (7/2048) interest in and to the oil, gas and other minerals in and under and that may be produced from the Northeast Quarter (NE1/4) of Section Sixteen (16), Township Eleven (11) North, Range Twenty-two (22) West I.M., in Beckham County, Oklahoma, containing 160 acres, more or less, according to the U.S. Government Survey thereof (being an undivided 0.546875 net acre of producing minerals)

#3

LEASED

Nov. - 2006

3 yrs.

An undivided seven-two thousand forty-eighths (7/2048) interest in and to the oil, gas and other minerals in and under and that may be produced from the Northeast Quarter (NE1/4) of Section Twenty-one (21), Township Eleven (11) North, Range Twenty-two (22) West I.M., in Beckham County, Oklahoma, containing 160 acres, more or less, according to the U.S. Government Survey thereof (being an undivided 0.546875 net acre of producing minerals)

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Charles ~~W~~<sup>B</sup> Farni,  
Personal Representative

JAMES R. WRIGHT, JR.  
Cornell, Wright & Tisdal  
Attorneys for Personal Representative  
Clinton and Cheyenne, Oklahoma